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Ex Parte

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

*Re: Implementation of the Local Competition Provisions in the Telecommunications
Act of 1996, CC Docket 96-98*

Dear Ms. Salas:

In response to recent ex partes submitted by Covad and WorldCom, Verizon provides the following input on the value of national performance measurement reporting. Verizon has developed significant experience with measurement plans and in light of that experience has compiled a list of key principles that should guide any development of a set of national performance measurements. Among those principles is identification of a small set of measurements that could be used to monitor LEC performance for UNEs, resale and interconnection across all states and LECs. Attached are the Verizon principles and a list of 12 measurements Verizon feels would be a reasonable, customer-focused approach to monitoring performance nationally. (The measurement numbers shown on the attachment correspond to the numbering Verizon uses in the performance measurement plans to which it is subject, including the performance measurements reported pursuant to the Bell Atlantic/GTE merger conditions.)

If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in cursive script that reads "Dee May".

Attachments

cc: D. Attwood
C. Carpino
K. Farroba
B. Olson

METRIC REPORTING PRINCIPLES

251 Metric Reporting:

- VZ supports a federal reporting vehicle whose underlying purpose is to insure that the local exchange market continues to remain open to competition. The key items to be reported would be 251 related—UNEs, Resold Services, and Interconnection.
- Verizon supports the creation of a small, simplified list of metrics, no more than 10 to 12 in total. The metrics would address the following domains: Pre-Ordering, Ordering, Provisioning, Maintenance & Repair, Network Performance and Billing.
- Verizon supports the goal of establishing a common set of definitions to be used nationally, with the recognition that there may be instances where differences in processes make differences in definitions inevitable.
- Verizon supports the goal of establishing a common set of reasonable statistical methodologies to be used nationally.
- Verizon feels strongly that the only appropriate standard is in comparison to a relevant retail measure, however, whenever a retail analog does not exist, Verizon will support the establishment of state specific benchmark standards, taking into consideration variations in market maturity and market evolution.
- Verizon agrees that these reporting requirements should be extended to all local telecommunications providers (ILEC's and CLEC's).
- Verizon accepts that compromises must be made in the definitions in order to achieve a uniform set of definitions, but these compromises must be ones Verizon can then accept as the definitions we would support in state proceedings.
- Verizon believes these national metrics should be used for informational purposes.
- Verizon supports the concept of administering a single set of metrics for any given jurisdiction.
- Verizon expects an exception process to be included in the national reporting that would permit Verizon to explain or restate results to reflect circumstances beyond Verizon's control.

Special Access Reporting:

- Performance Measurement reporting of Special Access services has no place in a competitive local exchange market proceeding or reporting plan.
- To the extent there are individual complaints about special access service performance, the section 208 complaint process is available just as it is for any service.

Proposed Metrics for Post 271 tracking with FCC

Metric #	Metric Name	Product	Standard Type
Pre-Order			
PO-2 – OSS Availability			
PO-2-02	OSS Interface Availability – Prime Time	All interfaces combined	Benchmark: 99.5%
Ordering			
OR-1 – Order Confirmation Timeliness			
OR-1	% On Time – LSRC Note: this would be the total of OR-1-02, OR-1-04 and OR-1-06	ALL Services Combined	Benchmark: 95%
Provisioning			
PR-4 - % Missed Appointments			
PR-4-04	% Missed Appointment – Dispatch	Combination of: <ul style="list-style-type: none"> • Resale POTS • UNE Platform • UNE Loop • UNE xDSL Loop 	Parity with retail POTS (dispatch)
PR-4-05	% Missed Appointment – No Dispatch	Combination of: <ul style="list-style-type: none"> • Resale POTS • UNE Platform 	Parity with retail POTS (no dispatch)
PR-4-07	% On Time Performance – LNP/Hot Cut	Combination of: <ul style="list-style-type: none"> • UNE LNP • UNE Hot cut loop 	Benchmark: 95%
PR-6 – Installation Quality			
PR-6-01	% Installation Troubles reported within 30 Days	Combination of: <ul style="list-style-type: none"> • Resale POTS • UNE Platform • UNE Loop 	Parity with Retail POTS
PR-6-01	% Installation Troubles reported within 30 Days	Combination of: <ul style="list-style-type: none"> • UNE 2 wire Digital Loop • UNE xDSL Loop 	Parity with Retail dispatched POTS

Metric #	Metric Name	Product	Standard Type
Maintenance			
MR-4 – Trouble Duration Intervals			
MR-4-02	Mean Time to Repair – Loop Trouble	Combination of: <ul style="list-style-type: none"> • Resale POTS • UNE Loop • UNE Platform • UNE xDSL Loop 	Parity with retail POTS
MR-4-03	Mean Time to Repair – Central Ofc. Trouble	Combination of: <ul style="list-style-type: none"> • Resale POTS • UNE Loop • UNE Platform • UNE xDSL Loop 	Parity with retail POTS
MR-5 – Repeat Trouble Reports			
MR-5-01	% Repeat Reports within 30 days	Combination of: <ul style="list-style-type: none"> • Resale POTS • UNE Loop • UNE Platform • UNE xDSL Loop 	Parity with retail POTS
Network Performance			
NP-2 – Collocation Performance			
NP-2-05/06	% On Time Collocation	Collocation ¹	Benchmark: 95%
Billing			
BI-2 – Timeliness of Carrier Bill			
BI-2-01	Timeliness of Carrier Bill	All CLEC bills	Benchmark: 98%

¹ Includes Physical and Virtual new and augments.